## THE MARKS LAW FIRM, P.C.

March 31, 2025

Application granted.

FILED VIA ECF

Hon. Ronnie Abrams United States District Judge Southern District of New York 40 Foley Square, Courtroom 1506 New York, NY 10007 SO ORDERED.

Hon. Ronnie Abrams

April 1, 2025

RE: Altaune Brown v. New Wen Zhou Wireless, Inc., et al.

Index: 1:25-cv-00070-RA

Dear Judge Abrams,

Pursuant to Section I(D) of Your Honor's Individual Part Rules ("Requests for Adjournments or Extensions of Time"), Plaintiff respectfully requests a <u>final</u> thirty (30) day extension of the deadline to submit a joint letter requesting that the Court either (1) refer the case to mediation or a magistrate judge, or (2) schedule an initial status conference from <u>April 1, 2025</u>, to <u>May 1, 2025</u>, in accordance with Your Honor's Orders dated January 7, 2025 and February 27, 2025 [Dkt. 5 and 11].

This request is being made because Plaintiff has been engaged in substantive settlement discussions with Alfred Lui, Esq., on behalf of Defendant, New Wen Zhou Wireless ("New Wen"). The parties have made progress towards resolution. Moreover, despite efforts, Plaintiff has been unsuccessful in communicating with Defendant, Wing Hee Condominium Inc. ("Wing Hee"), nor have we heard from said Defendant regarding this action.

In light of the above, Plaintiff respectfully requests a thirty (30) day extension of the deadline to submit a joint letter, which would allow Plaintiff and New Wen to continue exploring settlement, which, if a resolution is reached, would avoid the expenditure of unnecessary litigation costs and preserve this Court's time and resources. If the parties are unable to resolve, then Plaintiff intends to move for default judgment no later than <u>May 1, 2025</u>, in accordance with Your Honor's Individual Rules and Practices. This is the second request of its kind to extend.

Thank you for your attention to the above; please let us know if Your Honor requires any other information.

Respectfully Submitted,

The Marks Law Firm, P.C.

By: Bradly G. Marks